

Exhibit H

1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 IN AND FOR THE COUNTY OF ALAMEDA
3 --o0o--
4 ROSALINO REYES and GEMMA REYES,
5 Plaintiffs,
6 vs. No. RG20052391
7 JOHNSON & JOHNSON, et al.,
8 Defendants.

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13 TELEPHONIC DEPOSITION OF WILLIAM E. LONGO, Ph.D
14 Volume II
15 September 25, 2020

22 Job No: 4272256
23 Taken before JANICE L. BELCHER
24 CSR No. 12342
25 Pages: 79 - 248

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1 TELEPHONIC DEPOSITION OF WILLIAM E. LONGO, Ph.D
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3 BE IT REMEMBERED, that pursuant to Notice, and on
4 the 25th day of September, 2020, commencing at the hour
5 of 8:02 a.m. Pacific Standard Time, telephonically
6 before me, JANICE L. BELCHER, a Certified Shorthand
7 Reporter, appeared WILLIAM E. LONGO, Ph.D, produced as a
8 witness in said action, and being by me previously
9 sworn, was thereupon examined as a witness in said
10 cause.

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TELEPHONIC APPEARANCES:

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9 For the Defendants Longs Drug Stores California LLC, on
10 behalf of Longs Drug Stores California, Inc.; Safeway,
11 Inc.; and Lucky Stores, Inc.:
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1 back in the time when Walter McCrone taught it himself,
2 and they were dealing with asbestos added products,
3 where the chrysotile is these very large bundles, you
4 know, like the silly examples that Dr. Sanchez uses when
5 he says this is what it ought to look like.

6 It wasn't until we started, we looked at the
7 calidria and used that as a standard where the analyst
8 now knew that it had asbestos in it, but the Calidria
9 bundles, the size ranges in there are very similar to
10 the size ranges of the chrysotile in the sample. So
11 they had to know what to look for. And I don't think,
12 and so we could train any analyst and they would have to
13 have decades of experience. And of course you have to
14 have the kind of setup we have with our PLM scopes, so
15 this is reproducible.

16 But those MDL samples, to say we looked at them
17 in 1.550 and didn't find chrysotile, you know, that's a
18 misrepresentation of what happened.

19 Q. With respect to the Korean or the Philippine
20 market containers, so you're saying that the table I'm
21 looking at, Exhibit 10, page 8, Table 1, if we look at
22 that, so the narrative above where -- I guess, let's
23 start there, let's start at the narrative.

24 Page 3 of 15, the narrative discussing sample
25 002, specifically notes, the second sentence there

1 REPORTER'S CERTIFICATE
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3 I, JANICE L. BELCHER, do hereby certify:

4 That WILLIAM E. LONGO, Ph.D, in the foregoing
5 deposition named, was present and by me sworn as a
6 witness in the above-entitled action at the time therein
7 specified;

8 That said deposition was taken before me at said
9 time, and was taken down in shorthand by me, a
10 Certified Shorthand Reporter of the State of California,
11 and was thereafter transcribed into typewriting, and
12 that the foregoing transcript constitutes a full, true
13 and correct report of said deposition and of the
14 proceedings that took place;

15 IN WITNESS WHEREOF, I have hereunder subscribed my
16 hand this 5th day of October, 2020.

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24 JANICE L. BELCHER, CSR No. 12342
25 State of California